

I, Joseph M. Russell, hereby declare as follows, pursuant to Fed. R. Civ. P. 65 and the Court's minute entry (Dkt. 7) ("Order") of October 27, 2021:

1. I am a lawyer in the law firm von Briesen & Roper, s.c.
2. I represent the Plaintiff in the above-captioned matter.
3. I make this declaration based on my personal knowledge.
4. On October 27, 2021, I provided counsel (via email) for the Greater Rockford Airport Authority ("GRAA") Defendants, Thomas Lester, Plaintiff's Complaint (Dkt. No. 1), Plaintiff's Motion (Dkt. 3), and Plaintiff's Memorandum in Support of Motion (Dkt. No. 5). I also provided Attorney Lester the order (Dkt. No. 4) by which Judge Philip G. Reinhard recused himself from this case. Attorney Lester responded to my email on October 27, 2021, and indicated that he was not authorized to accept service on behalf of his client(s) at that time.
5. On the morning of October 28, 2021, I sent Attorney Lester (via email) the Court's Order (Dkt. No. 7). I also left a voicemail for Attorney Lester regarding the Order. Attorney Lester confirmed (via email) that I had complied with electronic delivery per the Court's Order. Attorney Lester indicated that a physical copy could be delivered to GRAA Director Mike Dunn's office at 60 Airport Drive, Rockford, Illinois.
6. On the morning of October 28, 2021, I called the U.S. Attorney's Office in Rockford, Illinois. I spoke with the clerk, who forwarded me to the voicemail of Monica Mallory, Assistant United States Attorney. Attorney Mallory called me back and I discussed the posture of the case, as well as the Court's Order, with her. She provided me her email address, to which my office sent her electronic copies of the materials this morning.
7. We have arranged deliveries of the physical copies of the papers to be delivered by noon today to both GRAA Director Mike Dunn and the U.S. Attorney's Office.

8. Regarding my bar membership, I have been a general member of the Northern District of Illinois Bar since 2005 and have appeared as lead counsel within the district (N. D. Il. Case No. 05-4673, *Williams v. Blagojevich, et al.*) and as lead trial counsel within the Seventh Circuit (W. D. Wis., Case No. 14-487, *Williams v. Schmidt, et al.*). I am currently collecting the necessary material to apply for membership in the trial bar, which I did not believe was necessary prior to a full trial on the merits.

9. My firm partner, Timothy Pike, is a general member of the Northern District of Illinois bar and is applying for admission to the trial bar today. Attorney Pike informed me this morning that he was in contact with the clerk who handles applications for trial bar membership and that she would be in position to approve his application if it is submitted today. Attorney Pike intends to appear at tomorrow's hearing, and will file his notice of appearance later today.

10. In the alternative, I respectfully request that the Court waive any requirement for my admission, or Attorney Pike's admission, to the Northern District of Illinois trial bar for tomorrow's hearing.

11. I intend to file a supplemental declaration this afternoon to confirm the delivery (by noon) of physical copies of the papers to the U.S. Attorney's Office and GRAA Director Mike Dunn, and status of the summons and service of the Complaint.

12. I am in the process of updating my cm/ecf contact information.

Pursuant to 28 U.S. C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 28th day of October, 2021, at Milwaukee, Wisconsin.

s/ Joseph M. Russell
Joseph M. Russell